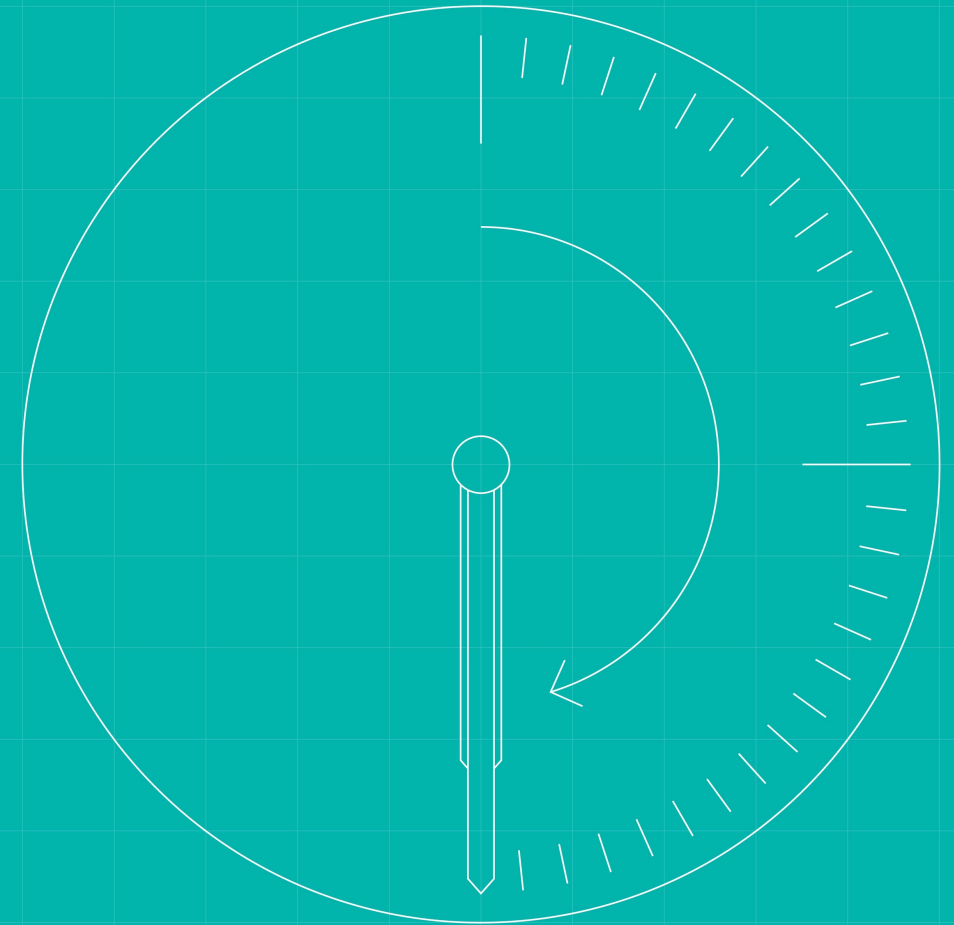


CR035 Impact Assessment Report & Recommendations



DECISION: CR035: Review the outputs of Impact Assessment and make a decision on next steps

Objective:

PSG to review the outputs of the reissued CR035 Impact Assessments and advise SRO on their decision to approve or reject the Change Requests.

Headlines:

- Responses to the CR035 Impact Assessment were largely in favour of the implementation of the Change Request.
- Response rates were higher than usual due to LDSOs submitting a communal vote in favour of the implementation of the Change Request.
- Overall: **28 respondents supported the change; 2 respondents rejected the change; and no respondents abstained from voting.**
- **The supporters of the change highlighted the following items/themes to support their decision:**
 - The split of TMAG into three groups will be positive and allow each group to focus on its own specific area. It will allow constituent parts to improve oversight and decision making. Greater attention will be given to the areas of the Programme that need it most.
 - The separation of TMAG will enable the Programme to be more effective in governance and to focus time on more specific areas and deliver at pace.
 - The changes to provide additional clarity on the processes for escalations and appeals were supported.
- **The respondents who voted against the Change Request did so on the following basis:**
 - MCAG should have separate Small, Medium and Large Supplier representation due to their different experiences of migration, data cleanse and transition/operational readiness.
 - The change would introduce resource constraints upon constituencies, especially small suppliers.
 - It is unclear how each group would communicate and manage interdependencies.

- **There were a number of requests/recommendations from supporting and rejecting respondents:**
 - Having one representative to cover all domestic suppliers will not work in practice. There should be separate Small, Medium and Large Supplier reps at MCAG.
 - An understanding of the timings, schedule and cadence of the meetings is required to enable consideration of resourcing requirements.
 - It was suggested that meetings should be run on the same day, or at minimum on consecutive days, to allow pre and post meetings to be amalgamated, thus reducing the impact on participants on their reps' time and schedules.
 - It was questioned whether an increased frequency of existing TMAG meetings, keeping the same representation, was considered as an option.
 - With reference to CR018, it was requested that a review was conducted over the existing voting mechanism at DAG, which resulted in LDSOs being outvoted by the DAG Chair when they raised concerns surrounding the implementation of the Change Request, and that it should be defined how the IPA considers appeals against decisions criteria taken via MHHS Governance.
 - Clarity was requested on what the decision-making responsibilities of each Advisory Group will be, and which Working Groups will sit under each Advisory Group.
 - RECCo recommends the implementation of a single Testing Advisory Group covering both SIT and Qualification testing, as the expertise required would be common across both groups, and doing so would reduce the impact on cost, resource and schedule.
 - Periodic review of governance ways of working should be undertaken every 6 months to ensure the processes remain valid and any working groups no longer needed are disbanded in a timely manner.
- **Programme implementation plan:**
 - Following approval of the Change Request, there will be an urgent action assigned to PMO to send out for new representative nominations for QAG, SITAG and MCAG. Requests will go out in the Clock on Wednesday 6th December.
 - Groups will be mobilised with a target start date in February 2024. PMO will be responsible for scheduling the meetings and ensuring these do not clash with pre-existing meetings.
 - The MHHS PMO will re-assign the relevant milestones within the programme plan and milestone register to the relevant governance group, and implement RAID governance at each of the newly established Governance Groups in line with existing operation.
 - To mitigate the impact of the increased number of governance groups requiring PMO support and wider programme meeting chairs upon programme capacity, the requirement for the production detailed minutes is proposed to be removed. Headline reports will continue to be produced and published and governance groups will continue to be recorded for Programme Participants to watch back.

CR035 – Submitted Impact Assessments

Programme Parties	CR032 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	3	1	-	1
Medium Suppliers	1	-	-	6
Small Suppliers	-	-	-	33
I&C	1	-	-	40
DNOs	6	-	-	-
iDNOs	13	-	-	-
Ind. Agents	-	-	-	47
Supplier Agents	-	-	-	7
S/W Providers	1	1	-	23
REC Code Manager	1	-	-	-
National Grid ESO	-	-	-	1
Consumer	-	-	-	1
Elexon (Helix)	-	-	-	1
DCC	1	-	-	-
SRO / IM & LDP	1	-	-	-
IPA	-	-	-	1
Avanade	-	-	-	1
Totals	28	2	-	162

Market Share			
Yes	No	Abstain	No Reply
59%	29%	-	12%
10%	-	-	90%
-	-	-	100%
20%	-	-	80%

Market Share information is according to the latest Meter Point Administration Number (MPAN) data held by the Programme as of August 2023. Market Share has not been provided for constituencies where MPAN data is not currently available.

Notes:
The classification of Independent and Supplier Agents is maintained by the Programme Party Coordinator and is subject to change.

No respondents have been marked as abstained.

CR035 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR035)
Large Suppliers	<ul style="list-style-type: none"> + Three of the four responding Large Suppliers supported the implementation of the Change Request. + The split of TMAG into three groups will be positive and allow each group to focus on its own specific area. + The changes to provide additional clarity on the processes for escalations and appeals were supported. + The one rejecting supplier stated their support of the proposal to split TMAG into constituent parts to improve oversight and decision making. – One responding Large Supplier rejected the Change Request. They did so on the basis of the proposed constituency representation at MCAG. They have requested the retention of separate Small, Medium and Large Supplier representation at this group. – There is a potential for cost implications as the splitting of the meeting may result in constituent parties having to resource these meetings through external representation. – The risk was raised that Qualification may become further siloed from Migration, which could result in suppliers with a large number of MPANs taking longer to complete their migration, and therefore potentially delaying M15. <ul style="list-style-type: none"> ▪ It was suggested that meetings should be run on the same day, or at minimum on consecutive days, to allow pre and post meetings to be amalgamated, thus reducing the impact on participants on their reps' time and schedules. ▪ The MCAG should have Large, Medium and Small supplier constituent representation, rather than an overall domestic supplier rep. ▪ It was noted that the current constituency model is no longer appropriate. There are now 3 different types of large suppliers: those going through SIT; those going through qualification; and those taking a mixed approach. It is argued that the diverse interests of these 3 groups cannot be covered by a singular rep. ▪ It was questioned whether an increased frequency of existing TMAG meetings, keeping the same representation, was considered as an option. ▪ It was questioned whether there were draft ToRs or outline scopes available for each group. ▪ It was questioned how the Programme will manage and align the interdependencies between test, qualification and migration if these are split into separate advisory groups.
Medium Suppliers	<ul style="list-style-type: none"> + The one responding Medium Supplier supported the implementation of the Change Request.
Small Suppliers	<i>Did not respond.</i>
I&C	<ul style="list-style-type: none"> + The one responding I&C Supplier supported the implementation of the Change Request, noting that they anticipated that TMAG would need to evolve and change following M9 and the divergence between those parties participating in SIT and those choosing to proceed via qualification. – They noted concerns regarding the resourcing impacts of increasing the number of meetings and how the appropriate constituency representatives will be sourced. <ul style="list-style-type: none"> ▪ They requested that the constituency split for the MCAG would be the same as for other groups.
Agents	<i>Did not respond.</i>

CR035 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR035)
DNOs	<ul style="list-style-type: none"> + All i/DNOs submitting a collective response, stating their support of the implementation of the Change Request. + They agreed that the separation of TMAG would enable the Programme to be more effective in governance and to focus time on more specific areas and deliver at pace. + They also welcome the clarity on appeals mechanisms. <ul style="list-style-type: none"> ▪ With reference to CR018, it was requested that a review was conducted over the existing voting mechanism at DAG, which resulted in LDSOs being outvoted by the DAG Chair when they raised concerns surrounding the implementation of the Change Request. ▪ It was recommended that it should be defined how the IPA considers appeals against decisions criteria taken via MHHS Governance.
iDNOs	<ul style="list-style-type: none"> ▪ <i>As above</i>
S/W Providers	<ul style="list-style-type: none"> + One responding Software Provider supported the implementation of the Change Request. They did so on the rationale that it was very unlikely that the risks would outweigh the benefits of the change. – One responding Software Provider rejected the implementation of the Change Request. They did so due to the resource constraints that the change would place upon constituencies, especially small suppliers. – They also noted that it was unclear how each group would communicate and manage interdependencies.
REC Code Manager	<ul style="list-style-type: none"> + RECCo voted in favour of the implementation of the Change Request. + They agreed that the splitting of TMAG would lead to more effective governance. <ul style="list-style-type: none"> ▪ They requested clarity on what the decision-making responsibilities of each Advisory Group will be, and which Working Groups will sit under each Advisory Group. ▪ RECCo recommends the implementation of a single Testing Advisory Group covering both SIT and Qualification testing, as the expertise required would be common across both groups, and doing so would reduce the impact on cost, resource and schedule.

CR035 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR035)
National Grid ESO	<i>Did not respond.</i>
Consumer	<i>Did not respond.</i>
Elexon (Helix)	<i>Did not respond.</i>
SRO / IM & LDP	<ul style="list-style-type: none"> + As the Change Raiser, the Programme is supportive of the implementation of the Change Request. + The newly established governance groups will have a small and more focussed remit to manage, meaning greater attention will be given to the areas of the Programme that need it most. – The Programme recognises that Programme Participants will need to attend more meetings, and therefore will require additional resourcing which could impact the ability of critical expertise and personnel to attend the meetings they are needed in to enable robust decision making and progress of artefacts. This is noted alongside the requirement of the MHHS PMO to facilitate more meetings with the same resource, which risks impacting the quality and timings of inputs into and outputs from the meetings. <ul style="list-style-type: none"> ▪ Periodic review of governance ways of working should be undertaken every 6 months to ensure the processes remain valid and any working groups no longer needed are disbanded in a timely manner. ▪ It is proposed that detailed minutes are removed from the scope of meeting outputs as this content is included within headline reports and meeting recordings.
IPA	<i>Did not respond.</i>
Avanade	<i>Did not respond.</i>